

Randall K. Edwards (Nevada Bar No. 203)  
 188 North 100 West  
 Bountiful, Utah 84010  
 801-328-0300 (office)  
 801-328-4822 (fax)  
 randall@randallkedwards.com  
 Attorney for Scotia International  
 of Nevada, Inc., Warren Barber  
 and Max Barber

Joseph J. Huggins (Nevada Bar No. 4456)  
 8275 S. Eastern Avenue, Ste. 200  
 Las Vegas, Nevada 89123  
 702-664-2074 (telephone)  
 702-940-4088 (fax)  
 Local Counsel for Service

**IN THE UNITED STATES DISTRICT COURT,  
 DISTRICT OF NEVADA, SOUTHERN DIVISION**

HYBRID INTERNATIONAL, LLC, a Texas  
 limited liability company; JOHNATHAN  
 SCHULTZ, an individual

Plaintiffs,

v.

SCOTIA INTERNATIONAL OF NEVADA,  
 INC, a Utah corporation; WARREN  
 BARBER, an individual; MAX BARBER, an  
 individual; DOES I THROUGH X; and ROE  
 business entities I through X, inclusive,

Defendants.

SCOTIA INTERNATIONAL OF NEVADA,  
 INC., a Utah corporation, WARREN  
 BARBER, an individual, and MAX WARREN  
 BARBER, an individual,

Counterclaimants,

v.

HYBRID INTERNATIONAL, LLC, a Texas  
 limited liability company, and JOHNATHAN  
 SCHULTZ,

Counterdefendants.

**MOTION TO WITHDRAW AS COUNSEL**

Case No. 2:19-CV-02077-JCM-EJY

Judge: JAMES C. MAHAN

Magistrate Judge: ELAYNA J. YOUCHAH

Pursuant to LR IA 11-6(b), the undersigned, Randall K. Edwards, Nevada Bar No. 203,

MOTION TO WITHDRAW AS COUNSEL

1 (“Counsel”) and Joseph J. Huggins, Nevada Bar No. 4456 (“Local Counsel”) hereby move to  
2 withdraw as counsel for the following:

3 **SCOTIA INTERNATIONAL OF NEVADA, INC. (“Client”)**

4 4455 South 700 East, Suite No. 300  
5 Salt Lake City, Utah 84107  
(Corporate Headquarters)

6 4643 Highland Drive  
7 Salt Lake City, Utah 84117  
(Office Building)

8 **WARREN DUNN BARBER (“Client”)**

9 3665 Millbrook Terrace  
10 Salt Lake City, Utah 84106  
mail@scotiaincorp.com

11 **MAX WARREN BARBER (“Client”)**

12 1098 South 1900 East  
13 Salt Lake City, Utah 84108  
max@scotiaincorp.com

14 The reasons for withdrawal are as follows:

15 An irreconcilable conflict between Counsel and Clients has arisen with regard to this case  
16 and other matters in which Counsel has represented Clients, which make Counsel’s  
17 continued representation of Clients untenable and impossible. Counsel is willing to  
18 divulge further information in this regard in an *ex parte in camera* communication to the  
Court, if required. Such communication must be confidential in order that the rights of  
Client will not be compromised in this action.

19 This motion is made without the client’s consent and is accompanied by: certification that  
20 Client has been served with (i) a copy of this motion, (ii) the attached written description of the  
21 status of the case, including the dates and times of any scheduled court proceedings, pending  
22 compliance with any existing court orders, and the possibility of sanctions.

23 Counsel for Plaintiffs do not oppose this motion.

24 The undersigned certifies that no trial date is set.

25 There are certain outstanding discovery requests in this case, issued by Plaintiff to  
26 Defendants (“Clients” herein), as follows:

- 27 • Hybrid International, LLC’s First Set of Interrogatories to Scotia International fo  
28 Nevada, Inc., dated 27 October 2020;

- Hybrid International, LLC's First Request for Production of Documents and Things to Scotia International of Nevada, Inc., dated 27 October 2020; and
- Hybrid International, OOC's First Request for Admissions to Scotia International of Nevada, Inc., dated 27 October 2020.

These discovery requests have been provided to Defendants/Clients.

Counsel for Plaintiff have agreed and stipulated that the responses to these discovery requests will not be due until 30 days after the time has expired for Defendants to appear and/or appoint new counsel, as ordered by this court.

The parties do not anticipate that this Withdrawal of Counsel will unreasonably delay discovery or any other proceeding before this court.

Under LR IA 11-6(b), the Clients may, but are not required to, file a response to this motion within 14 days of the filing thereof, unless otherwise ordered by the court.

In the event this motion is granted, Client or new counsel for Client must appear and file a notice of appearance after entry of the order, as directed by the court. No corporation, association, partnership, limited liability company or other artificial entity may appear *pro se*, but must be represented by an attorney who is admitted to practice in this court.

### CERTIFICATION

Counsel hereby certifies that a copy of this Motion for Withdrawal of Counsel has been sent to Clients at the addresses indicated above, and to counsel for Plaintiffs at the addresses indicated below.

DATED this 9<sup>th</sup> day of November, 2020.

/s/ Randall K. Edwards

Randall K. Edwards  
Nevada Bar No. 203  
188 North 100 West  
Bountiful, Utah 84010  
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/s/ Joseph J. Huggins  
Joseph J. Huggins  
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702-664-2074 (telephone)  
702-940-4088 (fax)  
Local Counsel for Service

**CERTIFICATE OF SERVICE**

I hereby certify that on the foregoing date cited above, I caused a true and correct copy of the foregoing to be served, via email, regular mail, and the court's electronic notification process, to the following:

Marquis Aurbach Coffing  
Scott A. Marquis, Esq.  
Michael D. Maupin, Esq.  
10001 Park Run Drive  
Las Vegas, Nevada 89145

/s/ Randall K. Edwards  
RANDALL K. EDWARDS  
Nevada Bar No. 203  
188 North 100 West  
Bountiful, Utah 84010  
801-328-0300 (office)  
801-328-4822 (fax)  
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